

April 2, 2000

Mr. Les Johnson Director, U.S. Department of Agriculture Food and Consumer Service Food Distribution Division 3101 Park Center Drive, Room 503 Alexandria, VA 22302

Dear Les,

I am writing to comment on USDA's "Proposal for Change" with regards to the Distribution 2000 Project. Of particular interest to my company is point # 3 related to updating product specifications. The willingness of the USDA to purchase heavy syrup products when light syrup products are either non-existent or short in stock will be a move that will undoubtedly help both buyer and producer.

As you may know, Pacific Coast Producers is a summer only producer of canned apricots, peaches, pears, fruit mix and tomatoes. We have at best, a 70-day window to produce 24 million cases worth of products in many different styles, sizes and packing mediums. It is very difficult to produce 100% of the needs of our customers in the specifically desired specification in this short time frame. On occasion, crop lateness or shortage causes us to alter our plans significantly to make the best of what we have been given by nature and sometimes with abundant sources, we are forced to put our excess into the most common selling size and syrup.

The industry standard for retail sized canned fruits is in the majority of heavy syrup and a smaller percent in juice packs. A very small percentage of our consistent annual volume is requested in light syrup. For all USDA out of season offerings, having heavy syrup as an option for PCP and the USDA will create an environment of better flexibility, rarer occurrence of shortage or out of stock and will most likely result in a more competitive and healthy marketplace for all parties involved.

Thank you for your consideration of this exception.

Best regards,

Andy Russick - Vice President, Retail Sales

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